

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JAMIE R. LAASS,

Defendant.

4:17CR3124

INDICTMENT
18 U.S.C. § 1343

FILED
U.S. DISTRICT COURT
DISTRICT OF NEBRASKA
2017 NOV 15 AM 11:19
CLERK OF THE COURT

COUNTS I-XV

1. From on or about July 30, 2009, and continuing to on or about April 19, 2016, JAMIE R. LAASS, the Defendant herein, devised and intended to devise a scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises from Doering Trenching & Plumbing.

2. It was part of the scheme and artifice that JAMIE R. LAASS served as bookkeeper for Doering Trenching & Plumbing, and its owner. During the course of the scheme, as part of her duties as bookkeeper, JAMIE R. LAASS was given use of Commercial State Bank Visa card, card no. XXXX-XXXX-XXXX-8081, the full number known to the Grand Jury, in the name of Doering Trenching & Plumbing. The credit card was billed to Doering Trenching & Plumbing at the business address of Doering Trenching & Plumbing in Bloomfield, Nebraska. JAMIE R. LAASS was provided the credit card for the exclusive purpose of paying for office expenditures. JAMIE R. LAASS was not authorized by Doering Trenching & Plumbing, to use the credit card for her personal expenses for herself or the expenses of others. All charges made on any Visa credit card are processed through electronic and wire communication through the Visa processing center in Fargo, North Dakota, and payments are processed through the Payment center in St. Louis, Missouri.

3. It was further part of the scheme that, JAMIE R. LAASS without the consent of the Doering Trenching & Plumbing, made unauthorized charges to the Commercial State Bank Visa card, card no. XXXX-XXXX-XXXX-8081, to pay for personal expenses for herself and personal expenses of others. By making such credit card charges, JAMIE R. LAASS represented to vendors that she had authority to make the purchase of a personal expense, when in truth and fact, as known by JAMIE R. LAASS, she was not authorized by the owner of Doering Trenching & Plumbing to use the Visa credit card for the purchase of personal items. It was further part of the scheme that JAMIE R. LAASS would execute bank card checks charged on the credit card account for card no. XXXX-XXXX-XXXX-8081, in order to receive funds from the credit card account in the name of Doering Trenching & Plumbing, without the knowledge or consent of Doering Trenching & Plumbing, or its owner. It was further part of the scheme that JAMIE R. LAASS would then pay for these unauthorized personal credit card charges by using the proceeds of Doering Trenching & Plumbing, and its owner, knowing that various credit card charges were not authorized or consented to by Doering Trenching & Plumbing, or its owner. During the course of the scheme, JAMIE R. LAASS, charged over \$200,000 in personal expenses and bank check charges without the authorization or consent of Doering Trenching & Plumbing, or its owner.

4. On or about the dates set forth below, in the District of Nebraska and elsewhere, JAMIE R. LAASS, having devised a scheme and artifice to defraud and obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, set forth above, and for the purpose of executing the scheme and artifice to defraud and obtain money, did knowingly cause to be transmitted in interstate and foreign commerce, by means of a wire communication, that is a wire transmission, certain signs, signals, and sounds as set forth below:

COUNT	DATE	COMMUNICATION
I	December 10, 2012	Credit charge on Visa credit card, card no. XXXX-XXXX-XXXX-8081, in the name of Doering Trenching & Plumbing to Hy-Vee, in the amount \$378.01.
II	December 10, 2012	Credit charge on Visa credit card, card no. XXXX-XXXX-XXXX-8081, in the name of Doering Trenching & Plumbing to Hy-Vee, in the amount \$378.01.
III	March 6, 2013	Credit charge on Visa credit card, card no. XXXX-XXXX-XXXX-8081, in the name of Doering Trenching & Plumbing to Wal-Mart, in the amount \$379.08.
IV	March 20, 2013	Credit charge on Visa credit card, card no. XXXX-XXXX-XXXX-8081, in the name of Doering Trenching & Plumbing to Lieber's Garage, in the amount of \$1,021.21.
V	August 10, 2013	Credit charge on Visa credit card, card no. XXXX-XXXX-XXXX-8081, in the name of Doering Trenching & Plumbing to Cable One, Inc., in the amount of \$153.61.
VI	October 22, 2013	Credit charge on Visa credit card, card no. XXXX-XXXX-XXXX-8081, in the name of Doering Trenching & Plumbing, Bank Card Check #81686, in the amount of \$1,500.00.
VII	December 13, 2013	Credit charge on Visa credit card, card no. XXXX-XXXX-XXXX-8081, in the name of Doering Trenching & Plumbing to Callaway Rolloffs Mini, the amount of \$1,497.08.
VIII	December 16, 2013	Credit charge on Visa credit card, card no. XXXX-XXXX-XXXX-8081, in the name of Doering Trenching & Plumbing to Dr. Joseph Aitken, in the amount of \$489.00.
IX	February 10, 2014	Credit charge on Visa credit card, card no. XXXX-XXXX-XXXX-8081, in the name of Doering Trenching & Plumbing, Bank Card Check #85056, in the amount of \$1,200.00.
X	February 20, 2014	Credit charge on Visa credit card, card no. XXXX-XXXX-XXXX-8081, in the name of Doering Trenching & Plumbing, to Cable One, Inc, in the amount of \$1,200.00 \$153.61 ⁵⁴
XI	April 17, 2014	Credit charge on Visa credit card, card no. XXXX-XXXX-XXXX-8081, in the name of Doering Trenching & Plumbing to Wal-Mart, in the amount \$181.90.

XII	May 20, 2014	Credit charge on Visa credit card, card no. XXXX-XXXX-XXXX-8081, in the name of Doering Trenching & Plumbing to Hy-Vee, in the amount \$378.01.
XIII	September 3, 2014	Credit charge on Visa credit card, card no. XXXX-XXXX-XXXX-8081, in the name of Doering Trenching & Plumbing to Nebraska Department of Motor Vehicles, in the amount \$627.79.
XIV	February 17, 2015	Credit charge on Visa credit card, card no. XXXX-XXXX-XXXX-8081, in the name of Doering Trenching & Plumbing to Dr. Joseph Aitken, in the amount of \$340.00.
XV	May 13, 2015	Credit charge on Visa credit card, card no. XXXX-XXXX-XXXX-8081, in the name of Doering Trenching & Plumbing to Dr. Joseph Aitken, in the amount of \$2,625.00.


In violation of Title 18, United States Code, Section 1343.

A TRUE BILL

FOREPERSON

The United States of America requests that trial of this case be held in Lincoln, Nebraska, pursuant to the rules of this Court.

By:



STEVEN A. RUSSELL, #16925
Assistant United States Attorney